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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

**MOTION TO WITHDRAW AS  
 COUNSEL OF RECORD FOR  
 PLAINTIFFS A.E., A.D., AND K.H.**

This Document Relates to:

*A.E. v. Uber Technologies, et al., Inc., et al.;*  
*3:25-cv-07668-CRB; and*

*A.D. v. Uber Technologies, et al., Inc., et al.;*  
*3:25-cv-07091-CRB; and*

*K.H. v. Uber Technologies, et al., Inc., et al.;*  
*3:25-cv-07700-CRB*

Pursuant to Local Rule 11-5, Dennis R. Reich, of Reich & Binstock, LLP, counsel of record (“Counsel”) for the above-referenced Plaintiffs, respectfully moves this Court for an Order allowing his firm, Reich & Binstock, LLP, to withdraw as counsel of records for Plaintiffs A.E., A.D., and K.H., as explained below.

Prior to Defendants filing their show cause motion [ECF 4137], Counsel met and conferred with opposing counsel on Friday, October 10, 2025, to discuss Plaintiffs’ alleged “non-bona-fide receipts” that the Plaintiffs previously provided to Counsel. After reviewing the ride receipts with opposing counsel, Reich & Binstock, LLP, advised of their intention to withdraw as counsel of records should the above-mentioned Plaintiffs fail to provide additional ride receipt proof. Relying on opposing counsel’s representations asserted during the meet and confer,

1 Counsel's office immediately attempted to contact the above-referenced Plaintiffs via phone call  
2 and email. Counsel informed the Plaintiffs of Defendant's concerns regarding the alleged "non-  
3 bona-fide receipts," and requested additional proof of the respective rides at issue. Counsel further  
4 attempted to contact Plaintiffs via phone call, email, and certified mail, requesting additional  
5 proof of ride receipt by October 20, 2025, explaining that Plaintiffs' respective cases may be  
6 dismissed and/or that Counsel would seek withdrawal as their attorneys. As required by Local  
7 rule 11-5(a), Counsel has provided written notice of Counsel's intent to withdraw, reasonably in  
8 advance, to the above-referenced Plaintiffs as well as notice to opposing parties.

9 At the time of this Motion to Withdraw, no additional ride receipt proof has been provided  
10 by Plaintiffs, A.E., A.D., or K.H., nor has any substitute counsel been identified.

11 WHEREFORE, the attorneys and law firm, Reich & Binstock, LLP, respectfully request  
12 that they be allowed to withdraw as counsel of records for Plaintiffs, A.E., A.D., and K.H. A  
13 courtesy copy of this motion will be served upon Plaintiffs at their last known address and via  
14 electronic mail.

15 Dated: October 27, 2025

Respectfully submitted,

16 By: /s/ Dennis C. Reich  
17 DENNIS C. REICH (SBN #69631)  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2025, I electronically transmitted the foregoing Motion to Withdraw as Counsel of Record to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendant's counsel via email at: [ubermdlservice@listserv.shb.com](mailto:ubermdlservice@listserv.shb.com)

/s/ Dennis R. Reich  
Dennis R. Reich